REMARKS

The foregoing amendments and the remarks that follow are meant to impart precision to the claims, and more particularly point out the invention, rather than to avoid prior art.

Claims 1-7, 9-15, and 17-23 are pending in the application. Claims 1-7, 9-15, and 17-23 were rejected. Claims 1, 9, and 17-23 have been amended. No new matter has been added.

35 U.S.C. 103

Claims 1-7, 9-15, and 17-23 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,865,599 ("Zhang") in view of U.S. Patent No. 6,708,172 ("Wong") in view of U.S. Patent App. Pub. No. 2002/0133561 ("O'Brien").

Zhang Is Inconsistent and Incompatible with Wong/O'Brien and Teaches Away from the Claimed Invention

The Examiner cited the combination of Zhang, Wong, and O'Brien to reject all of the claims. Fundamentally, Zhang discloses a peer-to-peer system. Indeed Zhang is entitled "Browser-to-Browser, DOM-Based, *Peer-to-Peer* Communication with Delta Synchronization." On the other hand, Wong fundamentally discloses a client/server architecture as shown, for example, in Figure 4. See, e.g., Wong, col. 14, lines 38-46 ("The system 400 includes client 410 and a server 450."). Likewise, O'Brien also discloses a "Client" and "Web Servers" in its client/server architecture. See, e.g., O'Brien, Figure 1. Thus, Zhang and Wong/O'Brien concern mutually exclusive architectures to address inconsistent design goals unique to each architecture. Thus, by their incompatibility, the proposed combination of these prior art references would result in an inoperative system.

The Examiner cited column 11, lines 35-39 of Zhang as allegedly disclosing the notion of a client-server architecture. However, Zhang merely states that "[w]hen the browser-broker connection is implemented in HTTP, a broker acts like an HTTP server." By this wording, Zhang is characterizing *internal components* of a peer computer system, *not* two computer systems that are together related as client and server. Indeed, in unequivocal terms, Zhang emphasizes the following: "Browser 1 and Broker 1 typically sit on the *same machine*. Web

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Browser 2 and Broker 2 typically sit on a *different machine*." Zhang, col. 5, lines 5-6 (emphasis added). Zhang is relevant, not as to the relationship of internal components within a machine, but rather as to the relationship of each disclosed machine to another machine.

Zhang repeatedly and forcefully reinforces its exclusive focus on peer-to-peer architecture. For example, Figure 1 clearly shows that the browser and associated broker do not each constitute a computer system by themselves, but rather together combine to form a single peer computer system. As another example, in the section entitled "6.2 Some Significant Features of the Invention," which was not cited by the Examiner, Zhang clearly states:

> "(2) Browser-to-Browser: Web browsers are used as front-ends for *peer-to-peer* dialogue
> . . .
>
> (7) Distributed Architecture: *Peers* are equal participants and conversations are bi-
> directional."

Zhang, col. 4, lines 10-25 (emphasis added). Accordingly, Applicants respectfully submit that the Examiner's reliance on an aberrant reference to internal components of a computer system should not vary the clear, uniform teaching in Zhang of peer-to-peer architecture. With its peer-to-peer architecture, Zhang is not properly combined with the other cited references and *teaches away* from the client-server architecture of the claimed invention. For this reason alone, claims 1, 9, and 17, as well as their dependent claims, are patentable.

> The Prior Art Fails To Teach: "wherein a first client computer comprises the first information handling system . . . saving, via the server, the translated excerpt in a first personal folder associated with the user of the first information handling system . . . wherein a version of the translated excerpt is saved in a second personal folder associated with the user of the second information handling system and a third personal folder associated with the user of the server, wherein a second client computer comprises the second information handling system"

As amended, claim 1 recites, inter alia: "wherein a first client computer comprises the first information handling system . . . saving, via the server, the translated excerpt in a first personal folder associated with the user of the first information handling system . . . wherein a version of the translated excerpt is saved in a second personal folder associated with the user of the second information handling system and a third personal folder associated with the user of the server, wherein a second client computer comprises the second information handling

system." Claims 9 and 17 recite similar claim limitations. None of the cited prior art references discloses this claim limitation.

The Examiner argued that O'Brien is most relevant to this claim limitation. Office Action, at 15. First, Applicants respectfully submit that the claim, as written, recites one user associated with the first information handling system and the second information handling system. Thus, contrary to the Examiner's arguments, the "disclosure of multiple folders, using multiple computers" involving multiple users in O'Brien *teaches away* from one user, as claimed.

In addition, the Examiner relied on "My Computer" in O'Brien as a first information handling system, and "X:\" in O'Brien as a second information handling system. Office Action, at 15-16. However, O'Brien clearly differentiates between client computers versus the X:\Drive having ultimate data resources 104. See Figure 1; para. 62 ("a variety of tiers, or layers, are present between the client 102 and the *ultimate data resources 104" that constitute the X:\Drive*). Thus, the X:\Drive in O'Brien is not a *client* computer having a second information handling system, as claimed.

Further, O'Brien fails to teach *multiple folders* in multiple computer systems associated with a user. In particular, O'Brien fails to disclose a *first client computer* including a first information handling system, a *second client computer* including a second information handling system, and a *server -- each containing a folder* associated with *one user* to save a translated excerpt, as claimed. Thus, claims 1, 9, and 17, as well as their dependent claims, are patentable.

The Prior Art Fails To Teach: "associating, via the server, a name, a source, and a comment with the translated excerpt"

As amended, claim 1 recites, inter alia: "associating, via the server, a name, a source, and a comment with the translated excerpt." Claims 9 and 17 recite similar claim limitations. The cited prior art does not disclose this claim feature.

> The Prior Art Fails To Teach: "saving, via the server, the translated excerpt in a first personal folder associated with the user of the first information handling system, the translated excerpt including a user-specified item of music, a website, a search query, and a search result"

As amended, claim 1 recites, inter alia: "saving, via the server, the translated excerpt in a first personal folder associated with the user of the first information handling system, the translated excerpt including a user-specified item of music, a website, a search query, and a search result." Claims 9 and 17 recite similar claim limitations. The cited prior art does not disclose this claim feature.

Accordingly, independent claims 1, 9, and 17 are patentable. The dependent claims are patentable both by their dependence on patentable independent claims and in their own right. While all of the Examiner's rejections are respectfully traversed, it is submitted that the foregoing reasons are sufficient to demonstrate the patentability of the pending claims without further address of any remaining rejections.

CONCLUSION

It is respectfully submitted that all of the Examiner's objections have been successfully traversed and that the application is now in order for allowance. Accordingly, reconsideration of the application and allowance thereof is courteously solicited.

Authorization is hereby given to charge our Deposit Account No. 50-2638 for any charges that may be due. Furthermore, if an extension is required, then such an extension is hereby requested.

Respectfully submitted,

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